

## **EXHIBT B**

**EXHIBIT “B”**

**DOCUMENT REQUESTS**

Please produce or if already produced, identify exact bates ranges with a brief identification of each document:

1. All documents relied upon by the deponent in preparing for this deposition.
2. All documents, product exemplars and retained products provided by Medscand Medical, Cooper Surgical Inc., or any previous manufacturer or distributor of TVT product or components and/or their representatives to Defendants including but not limited to all studies, data and other records related to TVT as referenced in ETH.MESH.05220458-ETH.MESH.05220464.
3. All communications between Defendants, Medscand Medical, Cooper Surgical Inc., or any previous manufacturer or distributor of TVT product or components and/or their representatives concerning transfer of TVT documents and retained product.
4. All agreements between Defendants and Medscand Medical, Cooper Surgical Inc., or any previous manufacturer or distributor of TVT product or components and/or their representatives concerning TVT including but not limited to transfer agreements, manufacturing agreements, license agreements, purchase orders, , and any amendments thereto.
5. All documents concerning testing, maintenance, and storage of TVT exemplars and retained product, including but not limited to: manifests or inventories, storage conditions, storage locations, testing methods and test results.
6. All documents provided by Medscand Medical, Cooper Surgical Inc., or any previous manufacturer or distributor of TVT product or components and/or their representatives to Defendants as required by the above referenced agreements.

7. All documents reflecting amounts paid by Defendants to Medscand Medical, Cooper Surgical Inc., or any previous manufacturer or distributor of TVT product or components and/or their representatives to. in connection with above referenced agreements.

8. All documents and/or communications referencing the decision as to whether or not to retain or destroy documents or exemplars received from Medscand Medical, Cooper Surgical Inc., or any previous manufacturer or distributor of TVT product or complonent.